

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

DARYUSH VALIZADEH, an individual,)	
)	Case No. <u>3:16-cv-03098-MGL</u>
Plaintiff,)	
)	
v.)	
)	
JANE DOE, a/k/a "Susan"; and)	PLAINTIFF'S RESPONSES TO LOCAL
JOHN AND JANE DOES 2-10, all)	RULE 26.01 INTERROGATORIES
whose true names are unknown,)	
)	
Defendants.)	
)	

Pursuant to Local Rule 26.01, Plaintiff DARYUSH VALIZADEH respectfully submits the following answers to the Court's standard interrogatories:

Interrogatory A:

State the name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: No person or legal entity has a subrogation interest in any of Plaintiff's claims.

Interrogatory B:

As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER:

1. Defamation Per Se against Jane Doe, a/k/a "Susan"

Jury trial demanded. Plaintiff is entitled to a jury trial as of right as it is an action at law where money damages in controversy exceed \$20, pursuant to the 7th Amendment of the U.S. Constitution.

2. False Light against Jane Doe a/k/a "Susan"

Jury trial demanded. Plaintiff is entitled to a jury trial as of right as it is an action at law where money damages in controversy exceed \$20, pursuant to the 7th Amendment of the U.S. Constitution.

3. Defamation Per Se against John and Jane Does 2-10

Jury trial demanded. Plaintiff is entitled to a jury trial as of right as it is an action at law where money damages in controversy exceed \$20, pursuant to the 7th Amendment of the U.S. Constitution.

4. False Light against Defendants John and Jane Does 2-10

Jury trial demanded. Plaintiff is entitled to a jury trial as of right as it is an action at law where money damages in controversy exceed \$20, pursuant to the 7th Amendment of the U.S. Constitution.

Interrogatory C:

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: The party submitting these responses is a natural person and is thus not a publicly owned company.

Interrogatory D:

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Venue in the Columbia Division is proper pursuant to Local Rule 3.01(A)(1) as a substantial part of the events giving rise to claim occurred in Elgin, South Carolina.

Interrogatory E:

Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related

action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Court of court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judge?

ANSWER: No.

Interrogatory F:

[Defendants only] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: N/A

Interrogatory G:

[Defendants only] If you contend that some other person or legal entity is in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: N/A

Dated: September 13, 2016.

Respectfully Submitted,

/s/ J. Paul Porter

 J. Lewis Cromer (#362)
 J. Paul Porter (#11504)
 J. LEWIS CROMER & ASSOCIATES, LLC
 1418 Laurel Street, Ste. A
 Post Office Box 11675
 Columbia, SC 29211
 Phone 803-799-9530
 Fax 803-799-9533
 Email: <pporter@jlewiscromerlaw.com>

Jay M. Wolman, *Pro Hac Vice* Motion
 Forthcoming
 RANDAZZA LEGAL GROUP, PLLC
 100 Pearl Street, 14th Floor
 Hartford, CT 06103
 Tel: 702-420-2001
 Fax: 305-437-7662
 Email: <ecf@randazza.com>

Attorneys for Plaintiff, Daryush Valizadeh

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this XX day of September 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

Employee / Agent of
J. LEWIS CROMER & ASSOCIATES, LLC